

SCIARRA & CATRAMBONE, LLC  
Jeffrey D. Catrambone (JC 2870)  
[jcatrambone@sciarralaw.com](mailto:jcatrambone@sciarralaw.com)  
1130 Clifton Avenue  
Clifton, NJ 07013  
(973) 242-2442  
(973) 242-3118 [Facsimile]

*Attorneys for Defendants Jeffrey Lancaster, Reynold Theriault, &  
Policemen's Benevolent Association Mainland Local 77 (pleaded as  
"Mainland Local PBA 77")*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

CHRISTOPHER LEARY,	:	CIVIL ACTION NO.
	:	1:23-cv-04070-JHR-SAK
Plaintiff,	:	
	:	
vs.	:	
	:	
EGG HARBOR TOWNSHIP POLICE	:	<b>CERTIFICATION OF COUNSEL</b>
DEPARTMENT, THE TOWNSHIP OF EGG	:	<b>IN SUPPORT OF MOTION</b>
HARBOR, MAINLAND LOCAL PBA #77,	:	<b>TO DISMISS PLAINTIFF'S</b>
NEW JERSEY STATE ASSOCIATION OF	:	<b>COMPLAINT IN LIEU OF</b>
CHIEFS OF POLICE, STATE OF NEW	:	<b>ANSWER PURSUANT TO</b>
JERSEY, MICHAEL HUGHES,	:	<b><u>F.R.C.P. 12(b) (6)</u></b>
individually and acting under	:	
color of law, WILLIAM NALLY,	:	
individually and acting under	:	
color of law, JEFFREY LANCASTER,	:	
individually and acting under	:	<i>Oral Argument Requested</i>
color of law, REYNOLD THERIAULT	:	
individually and acting under	:	
color of law, DONNA L MARKULIC,	:	
individually and acting under	:	
color of law, JOHN and JANE	:	
DOES 1-10, ABC CORPORATIONS,	:	
and XYZ STATE ENTITIES.	:	
	:	
Defendants.	:	
	:	

Jeffrey D. Catrambone, of full age, certifies as follows:

1. I am an attorney-at-law licensed to practice before this Court  
and a Partner with the law firm of Sciarra & Catrambone, LLC.

My firm represents Defendants Jeffrey Lancaster, Reynold Theriault, & Policemen's Benevolent Association Mainland Local 77 ("Defendants") in the above-captioned matter. As such, I am fully familiar with the facts herein. I make this Certification in support of Defendants' Rule 12(b)(6) motion to dismiss Plaintiff's Complaint for failure to state a claim.

2. Attached hereto are true and accurate copies of the following:

<b>EXHIBIT</b>	<b>DESCRIPTION</b>
<b>A</b>	Plaintiff's Complaint filed with this Court on 7/30/23
<b>B</b>	Plaintiff's Complaint filed with PERC dated 7/28/23

I hereby certify that the foregoing statements are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

**Sciarra & Catrambone, LLC**

*Attorneys for Defendants*

By: /s/ Jeffrey D. Catrambone (JC2870)

Dated: October 5, 2023